

Taimur Alamgir, Esq.
talamgir@kdylaw.com

www.kaufmandolowich.com

November 10, 2023

Via ECF

Honorable Sarah Netburn
 United States District Court
 40 Foley Square
 New York, NY 10007

Re: Cox, et al. v. Procida Construction Corp., et al. S.D.N.Y. No. 22-cv-10549 (LGS)

Your Honor:

Our firm represents Defendants in the above-captioned matter. I write, on behalf of both parties, to notify the Court of agreed-upon deposition dates and to propose a fact discovery deadline.

EVENT	DATE/DEADLINE
Deposition of Kassim Adams	December 5, 2023
Deposition of Barrington Henry	December 11, 2023
Deposition of Randy Clayton	December 12, 2023
Deposition of Kyle Cox	December 14, 2023
Deposition of Carlik Jones	December 21, 2023
Deposition of Mario Procida (also Rule 30(b)(6) Witness)	January 4, 2024
Proposed Fact Discovery Deadline	February 15, 2024

We thank the Court for considering this joint submission.

Respectfully Submitted,
KAUFMAN DOLOWICH, LLP



By: _____
 Taimur Alamgir

cc: Plaintiff's counsel (via ECF)